



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
1 CONGRESS STREET, SUITE 1100 (HBT)  
BOSTON, MASSACHUSETTS 02114-2023

[Click Here to Return to Main Index](#)

N60087.AR.000877  
NAS BRUNSWICK  
5090.3a

RECEIVED

December 2, 1999

Mr. Emil Klawitter (eeklawitter@efdnorth.navfac.navy.mil)  
Northern Division, Naval Facilities Engineering Command  
Code 1823/EK  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

**Re: Consensus Statement for Sites 14, 15, 16 and 18, Naval Air Station, Brunswick, Maine**

Dear Mr. Klawitter:

The EPA has reviewed the above draft document and agrees that sites 14, 15, 16 and 18 don't appear to pose an unacceptable risk to either human health or the environment. Formally closing these sites has been difficult in part because of the several years delay whilst more substantive issues at NAS Brunswick were being addressed and the resulting turnover of project personnel.

We have several textual comments to the draft consensus statement that will strengthen it by making the basis of our decision more clear in both technical and regulatory aspects. Pending favorable resolution of our textual comments in the final consensus statement, we can concur that no further action under CERCLA is required for sites 14 and 18 as they are known today.

Debris removal work was completed to our satisfaction at sites 15 and 16 this summer after the draft consensus statement was written. Because these sites are being considered for no further action, we are concerned that the closing magnetometer survey agreed upon in the mid 1990's was not performed. We also think it would be most prudent for a final soil sampling in the area of the lead exceedance at site 16 now that the debris has been removed. Alternatively, we feel that site issues should be decided upon by site specific technical merits as known today so that we can focus upon the most important issues at Brunswick. Thus, we propose to discuss and resolve these two issues regarding sites 15 and 16 at the technical meeting conference call on December 8, 1999.

Thank you for the opportunity to review the draft consensus statement, we look forward to resolving these four sites at Brunswick. If you have any questions, please contact me at 617-918-1344 or [barry.michael@epa.gov](mailto:barry.michael@epa.gov).

Sincerely,

Michael S. Barry  
Remedial Project Manager  
Federal Superfund Facilities Section

Attachment

cc. Claudia Sait/ME DEP ([claudia.b.sait@state.me.us](mailto:claudia.b.sait@state.me.us))  
Tony Williams/NASB ([WilliamsA@nasb.navy.mil](mailto:WilliamsA@nasb.navy.mil))  
Carolyn LePage/LePage Environmental ([clepagegeo@aol.com](mailto:clepagegeo@aol.com))  
Pete Nimmer/EA Environmental ([pln@aaest.com](mailto:pln@aaest.com))  
Tom Fusco/BACSE

Rev. 9 Bernier Topsham Community Res.

Attachment  
USEPA Comments to Draft Consensus Statement  
Sites 14, 15, 16 and 18, Naval Air Station, Brunswick, Maine

General Comments

1. To make the basis of our decision more clear, the second paragraph on the signature page should be revised to read as follows: "A consensus statement is appropriate to document this decision because site inspections conducted at Sites 14, 15, 16 and 18 indicated that none of these sites poses an unacceptable risk to human health or the environment. Therefore, no further investigation or remediation is needed, and a No Further Action decision is appropriate." **Explanation Note:** That these sites are not in the FFA has more to do with the fact that we haven't amended the FFA in years than with their only being SI sites. (We do NOT propose to amend the FFA for these sites at this date!)
2. The planned final magnetometer surveys for sites 15 and 16 should be performed or the likelihood of any remaining debris and the impact of such debris should be addressed and resolved.
3. Confirmatory soil sampling for lead in the area of exceedance at site 16 should be performed or this issue addressed and resolved.
4. Site 14 - Old Dump Number 3.
  - a. Site Investigation Activities Section. Add text to indicate that though the magnetometer survey was conducted during supplemental RI activities at Brunswick, it was functionally a site inspection for Site 14 and that no typical RI-type activities were ever conducted, nor warranted at Site 14.
  - b. Feasibility Study Section. Add that no alternatives other than "no action" were *recommended*.
5. Site 15 - Swampy Road Debris Site.
  - a. Site Investigation Activities Section. Debris has been removed to EPA's satisfaction at this site per our inspection in 8/99, the removal should be mentioned here.
  - b. Risk Assessment Section. We support ME DEP comments 2 and 4 in their letter of 6/30/99 in that contaminant levels should be stated in a table instead of the generic "low levels". The contaminant levels can then be explained as in ME DEP comment 2 and summarized with the standard "no significant risk to human health and the environment" phrase. This will support the no further action stated in the conclusion paragraph
6. Site 16 - Merriconeag Extension Site.
  - a. Site Investigation Activities Section. Debris has been removed to EPA's satisfaction at this site per our inspection in 8/99, the removal should be mentioned here
  - b. Risk Assessment Section. Similar to comment 4b above; what were the results of the comparison? Also, finish with the standard "no significant risk to human health and the environment" phrase to support the no further action stated in the conclusion paragraph.
7. Site 18 - West Runway Study Area. No comments. The EPA concurs with the draft Consensus statement as written for site 18.